

Peter C. Harvey
Thomas P. Kurland (*pro hac vice* pending)
PATTERSON BELKNAP WEBB & TYLER LLP
1133 Avenue of the Americas
New York, NY 10036-6710
Telephone: (212) 336-2000
pcharvey@pbwt.com
tkurland@pbwt.com
Attorneys for Plaintiff LTL Management LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

LTL MANAGEMENT LLC,

Plaintiff,

-v-

DR. JACQUELINE MIRIAM MOLINE,

Defendant.

Civil Action No.
3:23-cv-02990-GC-DEA

NOTICE OF MOTION

PLEASE TAKE NOTICE that, on July 3, 2023 at 10:00 a.m. (prevailing Eastern Time) or as soon thereafter as counsel may be heard, LTL Management LLC, the above-captioned plaintiff (the “Plaintiff”) by and through its counsel, shall move before the Honorable Georgette Castner, United States District Judge, at the United States District Court for the District of New Jersey, Clarkson S. Fisher Building and U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for the entry of an order directing the defendant, Dr. Jacqueline Moline, to produce an unredacted copy of the five-page document identifying the subjects included in her 2019 article *Mesothelioma Associated with the Use of Cosmetic Talc*, or other documents and/or information sufficient to show the same.

In support of this motion, Plaintiff relies on its prior pleadings in this action, its brief and supporting declaration filed contemporaneously herewith, and the supporting exhibits annexed thereto.

Dated: June 7th, 2023

**SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP**

Allison M. Brown
One Manhattan West
New York, New York 10001
T: (212) 735-3222
E: Allison.Brown@skadden.com

Respectfully submitted,

**PATTERSON BELKNAP WEBB &
TYLER LLP**

/s/ Peter C. Harvey

Peter C. Harvey
Thomas P. Kurland (*pro hac vice* pending)
1133 Avenue of the Americas
New York, NY 10036
T: (212) 336-2000
E: pcharvey@pbwt.com
tkurland@pbwt.com

KING & SPALDING, LLP

Kristen Fournier (*pro hac vice* pending)
1185 Avenue of the Americas
34th Floor
New York, NY 10036
T: (212) 556-2100
E: kfournier@kslaw.com